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April 16, 2025

VIA ECF

Honorable Edgardo Ramos
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Beverley v. New York City Health & Hosps., et al.
No. 18-CV-08486 (ER)

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the Office of the Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for the defendants New York City Health and Hospitals d/b/a NYC Health + Hospitals ("H+H), Mitchell Katz, Stanley Brezenoff, and Plachikkat V. Anantharam, in the above-referenced matter. Defendants write, on behalf of the parties, pursuant to the Court's Order dated April 9, 2025, to submit a joint status letter. See Order, ECF Dkt. No. 133. The parties certify that all discovery is complete. The parties recently conferred and have resumed settlement discussions. Defendants anticipate moving for summary judgment if the parties do not reach a resolution. However, given the parties are actively attempting to resolve the matter, Defendants request that the Court allow them to move for summary judgment within 60 days. We thank the Court for its consideration and attention to this matter.

Respectfully submitted,

_____/s_____
Dominique Anglade
Assistant Corporation Counsel

cc: Sandra D. Parker (via ECF)
Law Office of Sandra D. Parker
Attorneys for Plaintiff